

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

PARKER PELHAM, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

VBIT TECHNOLOGIES CORP., VBIT
MINING LLC, ADVANCED MINING GROUP,
DANH CONG VO a/k/a DON VO, PHUONG D
VO a/k/a KATIE VO, SEAN TU, JIN GAO,
LILLIAN ZHAO, and JOHN DOE
INDIVIDUALS 1-10, and DOE COMPANIES 1-
10,

Defendants.

Case No. 1:23-cv-00162-CFC-SRF

**NOTICE OF MOTION FOR PARKER PELHAM'S APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL**

TO: THE CLERK OF THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that lead plaintiff movant Parker Pelham (“Movant”) respectfully moves this Court for an order: (1) appointing Movant as Lead Plaintiffs pursuant to §21D of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); (2) approving Movant’s selection of Scott+Scott Attorneys at Law LLP as Lead Counsel and Christensen & Dougherty LLP as Liason Counsel for the Class; and (3) granting such other relief as the Court may deem just and proper.

This motion is based on this Notice and the Memorandum of Law filed herewith, the Declaration of Joseph L. Christensen in support thereof, including Exhibits A-D, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

DATED: April 17, 2023

CHRISTENSEN & DOUGHERTY LLP

s/ Joseph L. Christensen

Joseph L. Christensen (#5146)

1000 N. West St., Suite 1200

Wilmington, DE 19801

Telephone: 302-212-4330

joe@christensendougherty.com

SCOTT+SCOTT ATTORNEYS AT LAW LLP

John T. Jasnoch (*pro hac vice*)

600 W. Broadway, Suite 3300

San Diego, CA 92101

Telephone: 619-233-4565

Facsimile: 619-233-0508

jjasnoch@scott-scott.com

Counsel for Proposed Lead Plaintiff Parker Pelham

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

s/ Joseph L. Christensen

Joseph L. Christensen